

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2006 APR -4 AM 10:04

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY PL
DEPUTY CLERK

LAUREN BROWNING,

§

Plaintiff,

§

v.

§

Civil Action No. SA-05-CA-0245-FB

SOUTHWEST RESEARCH INSTITUTE,

§

Defendant.

§

DEFENDANT'S DESIGNATION OF PROPOSED EXHIBITS

TO THE HONORABLE JUDGE OF SAID COURT:

Pursuant to the Court's Scheduling Order of November 18, 2005, Defendant Southwest Research Institute submits the following designation of proposed exhibits. Defendant reserves the right to amend and/or supplement this list pursuant to Fed. R. Civ. P. 26(a)(3)(c) after discovery in this matter has been completed.

Identifying Numbers	Description	Offered	Admitted
BROWNING 171-172	Handwritten notes of Lauren Browning regarding conversation between Lauren Browning and English Pearcy on 01/31/03, dated 02/01/03		
BROWNING 191	Letter from Lauren Browning to Norm Yen, Service Employee's International Union dated 06/17/05		
BROWNING 191-193	Letter from Lauren Browning to Norm Yen, Service Employee's International Union dated 06/17/05 with attachment re: Janitors: Strength in Numbers		
BROWNING 194-198	Resume of Lauren Browning		

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Identifying Numbers	Description	Offered	Admitted
BROWNING 199	Letter from Lauren Browning to US PIRG Administrative Director re: Application for Employment (dated 06/25/05)		
BROWNING 200	Letter from Lauren Browning to Tex PIRG re: Application for Employment (dated 05/10/04):		
BROWNING 201	Letter from Lauren Browning to Sandia National Laboratories re: Application for Employment (dated 04/13/05)		
BROWNING 239	Aerotek E & E Job Posting for Senior Research Scientist/Geochemist (dated 10/17/05)		
BROWNING 274	Handwritten notes of Lauren Browning re: April 2002 Incident dated 02/11/03		
BROWNING 276	Handwritten notes of Lauren Browning re: Permissible sick leave? Dated 05/29/03		
BROWNING 277	Handwritten notes of Lauren Browning dated 04/19/02		
BROWNING 279	E-mail from Michael Smith to DMAC Members re: Salary Survey Reports (dated 02/05/03)		
BROWNING 332	Plaintiffs typed notes re: April 6, 2004 Meeting with English Pearcy		
BROWNING 333	Memo to Lauren Browning's file by English Pearcy re: April 6, 2004 Meeting with English Pearcy		
BROWNING 345	Plaintiff's 2000 W2 Form		
BROWNING 346	Plaintiff's 2001 W2 Form		
BROWNING 348	Plaintiff's 2002 W2 Form		
BROWNING 349	Plaintiff's 2003 W2 Form		
BROWNING 350	Plaintiff's 2004 W2 Form		
BROWNING 356-366	Brochure re: Women at SwRI		
EEOC 14	Notice of Right to Sue (dated 12/29/04)		

Identifying Numbers	Description	Offered	Admitted
EEOC 19	Plaintiffs Charge of Discrimination (dated 09/03/04)		
EEOC 21	Notice of Charge of Discrimination (dated 09/10/04)		
EEOC 62	Personnel Application Review Comment re: Lauren Browning (dated 05/18/98)		
EEOC 66	Interview Agenda for Les Bleamaster		
EEOC 67	Job posting for Principal Scientist (dated 08/19/04)		
EEOC 68-69	Letter from Lauren Browning to Roberto Pabalan re: Application for Employment (dated 05/08/98)		
EEOC 70-72	Appendix "F": External Salary Comparison		
EEOC 73-74	Appendix "G": Analysis of Defendant's Claims re: Promotions		
EEOC 86-97	Appendix "I": NRC Response to Plaintiff's Demotion		
EEOC 98-170	Appendix "J": Performance Evaluation Rebuttals and Self-Evaluations		
EEOC 176-183	Defendant's Response to Plaintiff's Charge of Discrimination		
EEOC 185	Emails to and from Lauren Browning and Sheila Ward-Reyes, EEOC re: meeting, dated 10/08/04, 10/11/04 and 10/13/04		
EEOC 189	Letter from Sheila Ward-Reyes, EEOC to Lauren Browning dated 09/30/04		
EEOC 208	Charge Questionnaire		
EEOC 272	Memo from Wes Patrick to Bill Crumlett re: Response to Department of Labor Audit Question (dated 08/21/01)		
EEOC 343-344	Letter from Lauren Browning from Roberto Pabalan re: Application for Employment (dated 05/08/98)		

Identifying Numbers	Description	Offered	Admitted
EEOC 374-376	Attachment "A": Notice of Charge and Charge of Discrimination		
EEOC 446	Attachment "K": Employee Profile of Lauren Browning		
EEOC 540	Handwritten notes of English Pearcy of meeting with Lauren Browning dated 02/06/04		
EEOC 541	Weekly Yucca Mountain Team Meeting Agenda dated 02/11/04		
EEOC 546	Handwritten notes of English Pearcy of meeting with Lauren Browning dated 01/10/02		
EEOC 560-561	CNWRA Research Scientists as of 05/21/04		
SwRI 1-5	SwRI Equal Employment Opportunity Policy Statements for January 2000 – January 2004		
SwRI 6	SwRI Complaint Procedure revised 01/2003		
SwRI 7	SwRI Sexual Harassment Policy revised 01/2003		
SwRI 8-12	SwRI Employee Standards of Conduct Handbook Policy 1.1.4 dated June 2002		
SwRI 13-15	SwRI Employee Standards of Conduct Handbook Policy 1.1.4 dated Feb. 1998		
SwRI 16-17	SwRI Equal Employment Opportunity Handbook Policy 2.1.1 dated Aug. 2001		
SwRI 18-24	SwRI Employment Procedures Handbook Policy Section 2.2.1 dated October 2000		
SwRI 25-26	SwRI Complaint Policy and Procedure Handbook Policy Section 2.1.8 dated Jan. 1996		
SwRI 27-193	New Employee Orientation Power Point Presentation dated January 2005		
SwRI 194-334	New Employee Orientation Power Point Presentation dated January 1998		
SwRI 335	SwRI Guide to Employment Orientation, Part I checklist		

Identifying Numbers	Description	Offered	Admitted
SwRI 336	SwRI Guide to Employment Orientation, Part II checklist		
SwRI 337-344	Employee Standards of Conduct: Compliance Program Educational Materials dated October 2003		
SwRI 345-348	Equal Employment Opportunity: Compliance Program Educational Materials dated October 2003		
SwRI 349-360	Health and Welfare benefits description dated January 2002		
SwRI 361-362	SwRI Continuing Education Transcript for Wesley Patrick		
SwRI 363-364	SwRI Continuing Education Transcript for English Pearcy		
SwRI 365-366	SwRI Continuing Education Transcript for David Pickett		
SwRI 367-368	SwRI Continuing Education Transcript for Budhi Sagar		
SwRI 369	SwRI Continuing Education Transcript for John Spencel		
SwRI 370-372	SwRI Continuing Education Transcript for Walter Downing		
SwRI 373-375	SwRI Continuing Education Transcript for Bill Crumlett		
SwRI 376-377	SwRI Handbook Section 2.1.4: Advancement Policies and Procedures and Salary Administration dated August 1991		
SwRI 378-379	SwRI Handbook Section 2.1.5: Performance Evaluation dated January 1996		
SwRI 380-383	SwRI Classification of Employees Handbook Policy 2.2.1 dated Oct. 1999		
SwRI 384-385	February 26, 1997 memo to CNWRA Staff from Budhi Sagar re: staff evaluations		
SwRI 386-390	SwRI career letters and job guidelines dated June 2001		
SwRI 391-395	SwRI career letters and job guidelines December 2003		

Identifying Numbers	Description	Offered	Admitted
SwRI 396-561	SwRI Salary Administration Program dated January 2002 (including all Appendices A-O as produced)		
SwRI 562-582	January 14, 2002 memo from Bill Crumlett re: Mid Fiscal Year 2002 Salary Adjustments (including Salary Ranges, Watson Wyatt Maturity Curves, Fiscal Year 2003 Planning Calendar)		
SwRI 583-608	July 8, 2002 memo from Bill Crumlett re: Fiscal Year 2003 Salary Adjustments Attachment "A" Fiscal Year 2003 Salary Adjustment Schedule Attachment "B" SwRI Salary Ranges for 2002 Attachment "C" SwRI Salary Survey Comparisons by Job Title Attachment "D" Maturity Curve Attachment "E" Merit Increase Planning Guide Attachment "F" SwRI Fiscal Year 2003 Calendar		
SwRI 609-626	January 14, 2003 memo from Bill Crumlett re: Mid Fiscal Year 2003 Salary Adjustments Attachment "A" January 2003 SwRI Salary Ranges Attachment "B" 2002 Watson Wyatt Maturity Curves Attachment "C" Merit Increase Planning Guide Attachment "D" SwRI Fiscal Year 2003 Calendar		
SwRI 627-639	January 9, 2004 memo from Bill Crumlett re: Mid Fiscal Year 2004 Salary Adjustments Attachment "A" 2004 Salary Ranges Attachment "B" Merit Increase Planning Guide Attachment "C" SwRI Fiscal Year 2004 Calendar		

Identifying Numbers	Description	Offered	Admitted
SwRI 640-659	July 9, 2003 memo from Bill Crumlett re: Fiscal Year 2004 Salary Adjustments Attachment "A" 2004 Salary Adjustment Schedule Attachment "B" SwRI Salary Survey Comparisons by Job Title Attachment "C" Maturity Curve Attachment "D" Merit Increase Planning Guide Attachment "E" SwRI Fiscal Year 2004 Calendar		
SwRI 666	Professional Bio for Lauren Browning		
SwRI 667	August 1999 Performance Evaluation for Lauren Browning		
SwRI 668-692	Technical Staff Self Evaluation Report (dated 07/23/99)		
SwRI 693	February 2000 Performance Evaluation Summary for Lauren Browning		
SwRI 694-702	Technical Staff Self-Evaluation Report (dated 01/31/00)		
SwRI 703	February 2001 Performance Evaluation Summary for Lauren Browning		
SwRI 704-710	Technical Staff Self-Evaluation Report (dated 01/22/01)		
SwRI 711-713	January 2002 Performance Evaluation Summary for Lauren Browning		
SwRI 714-722	Technical Staff Self Evaluation Report (dated 01/25/02)		
SwRI 723-724	2002 Performance Evaluation Summary for Lauren Browning (dated 01/29/03)		
SwRI 725-732	2002 Technical Staff Self Evaluation Report by Lauren Browning (dated 01/21/03)		
SwRI 733-734	2003 Performance Evaluation Summary for Lauren Browning (dated 01/29/04)		

Identifying Numbers	Description	Offered	Admitted
SwRI 735	2003 Performance Evaluation Summary Rebuttal by Lauren Browning (dated 02/11/04)		
SwRI 736-744	2003 Technical Staff Self Evaluation Report by Lauren Browning (dated 01/19/04)		
SwRI 757	Payroll Authorization Request for Lauren Browning (dated 05/17/04)		
SwRI 758	Resignation Letter of Lauren Browning (dated 05/10/04)		
SwRI 759	Letter from John W. McLeod, General Counsel to Lauren Browning re: departure as SwRI employee (dated 06/23/04)		
SwRI 760	SwRI Authorization to Disclose Information with handwritten note of Lauren Browning: decline to sign dated 05/21/04		
SwRI 761	Payroll Authorization Request for Lauren Browning re: status change to regular full time employee (dated 10/06/02)		
SwRI 762-764	Contract of Employment for Regular Employee signed by Lauren Browning (dated 10/18/00)		
SwRI 765	Letter from Bill Crumlett to Lauren Browning re: change in status (dated 10/10/00)		
SwRI 766	Memo from Wes Patrick to Tony Magaro re: change of employment status for Dr. Lauren B. Browning (dated 10/06/00)		
SwRI 767	E-mail from Wes Patrick to Tony Magaro re: change in Geochemist position description (dated 09/29/00)		
SwRI 768	Payroll Authorization Request for Lauren Browning re: extension of limit term contract until 12/08/00 (dated 10/15/99)		
SwRI 769	Payroll Authorization Request for Lauren Browning re: employment of Browning for limited one year contract (dated 12/07/98)		
SwRI 770-772	Contract of employment for regular employee signed by Lauren Browning on 09/18/98, signed by Bill Crumlett (dated 12/07/98)		

Identifying Numbers	Description	Offered	Admitted
SwRI 773-774	SwRI Employee Standards of Conduct Acknowledgment for 2002 and 1998		
SwRI 775	Applicant Action Form re: Lauren Browning (dated 07/02/98)		
SwRI 776	Personal Requisition Form re: Lauren Browning (dated 02/09/98)		
SwRI 777	Environmental, Physical and other requirements re: visiting scientist position (undated)		
SwRI 778	Draft advertisement for limited term Geochemist (undated)		
SwRI 779	Letter from J. Dan Bates to Lauren Browning re: employment as research scientist at SwRI (dated 12/08/98)		
SwRI 781	Procurement Integrity Act signed by Lauren Browning (dated 12/07/98)		
SwRI 782-783	Guide to Employment Orientation Parts I and II signed by Lauren Browning 12/07/98 and 12/11/98		
SwRI 785	E-mail from Barbara James to English Pearcy and Wes Patrick re: Lauren Browning salary negotiation (dated 08/31/98)		
SwRI 786	Letter from Bill Crumlett to Lauren Browning making offer of employment (dated 09/14/98)		
SwRI 787	Letter from Lauren Browning to Bill Crumlett re: acceptance of employment-offer (dated 09/19/98)		
SwRI 797	Letter from Lauren Browning to Barbara James re: letters of recommendation (dated 06/27/98)		
SwRI 798	Telephone or verbal conversation records re: application of Lauren Browning (dated 07/22/98)		
SwRI 802-805	Browning's Application for SwRI Salary Staff Position (dated 06/25/98)		

Identifying Numbers	Description	Offered	Admitted
SwRI 806-810	Letter from Lauren Browning to SwRI re: employment with SwRI (dated 05/08/98) and Lauren Browning resume.		
SwRI 820	Professional Personnel Qualification and Training Record re: Lauren Browning (dated 09/15/03)		
SwRI 821	Professional Personnel Qualification re: Lauren Browning (dated 08/26/98)		
SwRI 822-823	Procedure Identification and Training re: Lauren Browning (dated 09/03/02)		
SwRI 824-825	Procedure Identification and Training re: Lauren Browning (dated 09/06/0)		
SwRI 826	CNWRA Certificate to Lauren Browning re: technical specialist audit observation training (dated 07/05/00)		
SwRI 827-828	Procedure Identification and Training re: Lauren Browning (dated 02/19/04)		
SwRI 836	Exit Interview re: Lauren Browning (dated 05/21/04)		
SwRI 837	Letter of Resignation dated 05/10/04		
SwRI 838	Payroll Authorization Request re: Lauren Browning resignation (dated 05/21/04)		
SwRI 842	E-mail from Wes Patrick to English Pearcy re: Browning acceptance (dated 09/17/98)		
SwRI 843	E-mail from Budhi Sagar to Wes Patrick, et al. re: negotiation of L. Browning offer (dated 09/08/98)		
SwRI 844	E-mail from Wes Patrick to Barbara James re: negotiation of Lauren Browning's salary (dated 08/31/98)		
SwRI 845	Letter from Bill Crumlett to Lauren Browning confirming change in status to regular employee (dated 10/10/00)		
SwRI 846	Memo from Lauren Browning to English Pearcy dated 04/12/02 re: Travel without Authorization		

Identifying Numbers	Description	Offered	Admitted
SwRI 847	Memo from English Pearcy to Lauren Browning and to Personnel File dated 04/12/02 re: Travel without Authorization		
SwRI 848	Memo from Lauren Browning to English Pearcy dated 04/11/02 re: Land and Greenspace Committee meeting.		
SwRI 849	Memo from English Pearcy to Lauren Browning dated 04/11/02 re: Land and Greenspace Committee meeting		
SwRI 850	NRC Memo to Service Vendor from Barbara Meehan re: official travel of government contractor (Browning) (dated 10/21/02)		
SwRI 851	Yucca Mountain Team Meeting Attendance		
SwRI 852	Interview Agenda for Lauren Browning		
SwRI 854	Interim feedback on performance of Lauren Browning (dated 03/19/04)		
SwRI 855	Memo to Lauren Browning file by English Pearcy re: discussion of performance (dated 04/06/04)		
SwRI 856	E-mail from English Pearcy to Lauren Browning re: bi-weekly reports (dated 04/12/04)		
SwRI 857	Draft memorandum from English Pearcy to Lauren Browning re: follow-up on performance evaluation (dated 03/18/04)		
SwRI 858	Draft memorandum from English Pearcy to Lauren Browning re: follow-up on performance evaluation (dated 03/12/04)		
SwRI 859	Weekly Yucca Mountain Team Meeting Agenda (dated 02/11/04)		
SwRI 860	E-mail from Pat Mackin to Wes Patrick re: travel for L. Browning (dated 06/24/03)		
SwRI 861	E-mail from Pat Mackin to Lauren Browning re: travel procedures (dated 06/25/03)		

Identifying Numbers	Description	Offered	Admitted
SwRI 862-863	E-mails between Wes Patrick and Jack Fernandi re: labor transfer - L. Browning (dated 04/25/02)		
SwRI 864	SwRI Electronic Timekeeping System re: Lauren Browning week starting 04/06/02		
SwRI 865	Note to file by English Pearcy re: discussion with L. Browning of collaborative work between Division I and II (dated 04/24/02)		
SwRI 866	Note to file by English Pearcy re: Browning time card (dated 04/19/02)		
SwRI 867	E-mail from English Pearcy to Lauren Browning re: labor transfer form (dated 04/19/02)		
SwRI 872-873	Memo from Lauren Browning to English Pearcy re: KTI Agreement Item Status		
SwRI 874-876	E-mails between English Pearcy and Lauren Browning re: FY 2002 Capital Request (dated 07/16/01)		
SwRI 877	E-mail from Lauren Browning to Wes Patrick re: Mars initiative with handwritten notes (dated 05/21/01)		
SwRI 878-944	Personnel file of Walter Illman		
SwRI 945-1053	Personnel file of David Pickett		
SwRI 1054-1158	Personnel file for James Prikryl		
SwRI 1159	Employee Salary Info re: Lauren Browning 1998-2004 (dated 10/31/05)		
SwRI 1160	Employee Salary Info re: Walter Illman 1999-2001 (dated 10/31/05)		
SwRI 1161	Employee Salary Info re: James Prikryl 09/97-2005 (dated 10/31/05)		
SwRI 1167-1168	SwRI Advancement Policies and Procedures and Salary Administration Handbook Policy 2.1.4 dated Aug. 1991		

Identifying Numbers	Description	Offered	Admitted
SwRI 1169-1170	SwRI Performance Evaluation Handbook Policy 2.1.5 dated Jan. 1996		
SwRI 1171-1172	SwRI Termination of Employment Handbook Policy 2.1.6 dated July 2000		
SwRI 1173-1183	Overview of Staff Performance Evaluation Process - Power Point Presentation (dated 07/25/03)		
SwRI 1184-1190	SwRI Employment Procedures Handbook Policy 2.1.2 dated Oct. 2000		
SwRI 1191-1194	SwRI Classification of Employees Handbook Policy 2.2.1 dated Oct. 1999		
SwRI 1195-1198	SwRI Expense Accounts Handbook Policy 5.2.3 dated June 2003		
SwRI 1199-1207	SwRI Travel Polices Handbook Policy 5.3.1 dated June 2002 and Attachment to OPP 5.3.1 dated June 2003		
SwRI 1208	SwRI Travel Authorization Form Handbook Policy 5.3.1 dated June 1998		
SwRI 1209-1213	SwRI Travel Policies Handbook Policy 5.3.1 dated June 1998 and Attachments to OPP 5.3.1 dated June 1998		
SwRI 1214	SwRI Corporate Card Program Handbook Policy 5.3.2 dated March 2002		
SwRI 1215-1216	SwRI Corporate Card Program Handbook Policy 5.3.2 dated Dec. 1997		
SwRI 1217-1220	SwRI Time Control and Payroll Administration Handbook Policy 5.1.1 dated March 2001		
SwRI 1221	SwRI Internal Research and Development Program Handbook Policy 3.1.3 dated Dec. 1999		
SwRI 1222-1245	SwRI Internal Research and Development Program Description and Guidelines for Applicant (dated 03/05)		
SwRI 1246-1252	SwRI Staff Development Handbook Policy 3.1.2 dated Feb. 2004		

Identifying Numbers	Description	Offered	Admitted
SwRI 1253-1258	SwRI Staff Development Handbook Policy 3.1.2 dated Jan. 2003		
SwRI 1259-1260	SwRI Complaint Policy and Procedure Handbook Policy 2.1.8 dated Jan. 1996		
SwRI 1261	Organization Chart for CNWRA (dated 03/17/04)		
SwRI 1262	Organization Chart for CNWRA (dated 10/10/03)		
SwRI 1263	Organization Chart for CNWRA (dated 07/11/03)		
SwRI 1264	Organization Chart for CNWRA (dated 04/10/03)		
SwRI 1265	Organization Chart for CNWRA (dated 04/07/03)		
SwRI 1266	Organization Chart for CNWRA (dated 06/14/02)		
SwRI 1267	Organization Chart for CNWRA (dated 03/06/02)		
SwRI 1268-1270	SwRI Employee Benefits		
SwRI 1271	TIAA CREF Administrator Access for Lauren Browning Accounts		
SwRI 1272-1276	SwRI Personal Leave, Holidays and other Leave Handbook Policy 2.3.1 dated April 2003		
SwRI 1277-1281	SwRI Personal Leave, Holidays and other Leave Handbook Policy 2.3.1 dated Aug. 2001		
SwRI 1282	SwRI Required Employee Insurance Programs Handbook Policy 2.3.2 dated Feb. 1997		
SwRI 1283-1286	SwRI Sick Leave, Medical Emergency Leave, Paternity & Adoption Leave, and Bereavement Leave Handbook Policy 2.3.3 dated June 2003		

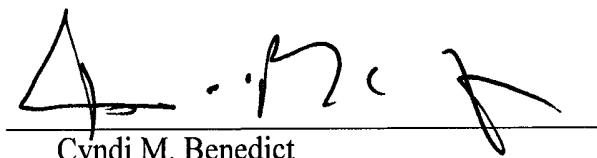
Identifying Numbers	Description	Offered	Admitted
SwRI 1287-1290	SwRI Sick Leave, Medical Emergency Leave, Paternity & Adoption Leave, and Bereavement Leave Handbook Policy 2.3.3 dated Sept. 2002		
SwRI 1291-1292	SwRI Sick/Emergency Leave Handbook Policy 2.3.3 dated March 1998		
SwRI 1293-1298	SwRI Occupational Injury or Illness Handbook Policy 2.3.4 dated Sept. 2003		
SwRI 1299-1301	SwRI Occupational Injury or Illness Handbook Policy 2.3.4 dated Sept. 1998		
SwRI 1302-1306	SwRI Retirement Benefits Handbook Policy 2.3.6 dated April 2003		
SwRI 1307-1308	SwRI Voluntary Health Care and Insurance Programs Handbook Policy 2.3.7 dated April 2003		
SwRI 1309-1310	SwRI Voluntary Health Care and Insurance Programs Handbook Policy 2.3.7 dated Feb. 1997		
SwRI 1311-1314	SwRI Family and Medical Leave Handbook Policy 2.3.8 dated July 2003		
SwRI 1315-1318	SwRI Family and Medical Handbook Policy 2.3.8 dated March 1998		
SwRI 1319-1320	SwRI Section 125 Plan Handbook Policy 2.3.9 dated July 2003 (Cafeteria Plan)		
SwRI 1321-1322	SwRI Section 125 Plan Handbook Policy 2.3.9 dated Feb. 1997		
SwRI 1328-1331	SwRI Employee Assistance Program Handbook Policy 2.3.10 dated Jan. 2003		
SwRI 1332-1334	SwRI Employee Assistance Program Handbook Policy 2.3.10 dated Dec. 1999 (reissued)		
SwRI 1335	Benefit Change Form for Lauren Browning (dated 12/31/02)		
SwRI 1336	Benefit Change Form for Lauren Browning (dated 01/01/02)		
SwRI 1337	Beneficiary Change for Lauren Browning (dated 11/20/01)		

Identifying Numbers	Description	Offered	Admitted
SwRI 1338	Benefit Change for Lauren Browning (dated 01/01/01)		
SwRI 1339	Benefit Change for Lauren Browning (dated 07/16/99)		
SwRI 1340-1341	Benefit Sign-up re: Lauren Browning (dated 12/15/98)		
SwRI 1342	Payroll Deductions		
SwRI 1343-1348	SwRI Value of Institute Benefits for 2004		
SwRI 1349	Paid Time Off Program Calculations for Calendar Year 2005		
SwRI 1350	SwRI Other Benefit Calculations		
SwRI 1356-1360	SwRI Retirement Benefits Handbook Policy 2.3.6 dated Dec. 1999		
SwRI 1437-1443	Excerpts from SwRI CNWRA Strategic Plan re: Revision 6 (dated 07/01)		
SwRI 1444-1451	Excerpts from SwRI CNWRA Strategic Plan re: Revision 7 (dated 12/02)		
SwRI 1452-1463	Excerpts from SwRI CNWRA Five Year Strategic Plan (dated 01/04)		
	Plaintiff's Medical Records from Dr. Jeffrey Pickens (Pl's primary care physician)		
	Plaintiff's Dental Records from John R. Huriega, DDS		
	Plaintiff's therapy records from Kay Pennington		
	Plaintiff's employment records from Keramont Corp.		
	Plaintiff's employment records from Lunar and Planetary Institute		
	Plaintiff's employment records from National Aeronautics & Space Administration (NASA)		
	Plaintiff's employment records from Sandia National Laboratories		

Identifying Numbers	Description	Offered	Admitted
	Plaintiff's employment records from Service Employee's International Union		
	Plaintiff's employment records from Texas Industrial Areas Foundation		
	Plaintiff's employment records from TEXPIRG (Texas Public Interest Research Group)		
	Plaintiff's employment records from University of Hawaii at Manoa		
	Plaintiff's employment records from University of Texas at Austin		
	Interview and selection documents regarding employment of Jude McMurry		
	Exit Interview of Melissa Hill		

Dated: April 4, 2006

Respectfully submitted,



Cyndi M. Benedict

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OF COUNSEL:

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CERTIFICATE OF SERVICE

This pleading, Defendant's Designation of Potential Witnesses, was served in compliance with Rule 5 of the Federal Rules of Civil Procedure by Certified Mail, Return Receipt Requested on Monday, April 3, 2006.

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